



Victoria Davis Lockard
Tel: (678) 553-2103
Fax: (678) 553-2100
lockardv@gtlaw.com

December 21, 2020

VIA CM/ECF

The Honorable Joel Schneider
United States District Court for the District of New Jersey
Mitchell H. Cohen Building
& U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

**Re: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation.*,
U.S. District Court for the District of New Jersey; Case No. 1:19-md-02875-
RBK-JS**

Dear Judge Schneider:

In accordance with the Court's December 2, 2020 Order (Dkt. 647), as modified by agreement of the parties with the Court's written approval on December 17, 2020, the parties hereby serve the attached validation protocol for entry by the Court. The attached validation protocol is agreed to by the Plaintiffs and Teva, to be used for completing Teva's review of the documents in the custodial files of Teva's agreed custodians.

The ordered protocol provided for required review of 25% of the highest scoring documents identified by the CMML system in the custodial files of Teva's agreed custodians. Teva has expressed its position that the provision requiring review of no less than 25% of the highest scoring documents identified by the CMML system is unnecessary and beyond reasonable requirements, but in the spirit of compromise and in order to facilitate compliance with the Court's deadlines, Teva agrees to the 15% review provision, which Teva maintains is unnecessary and beyond reasonable requirements, under the current circumstances. Plaintiffs disagree with Teva's position and maintain that a review of 25% of the highest scoring documents identified by the CMML system in the custodial files of Teva's agreed custodians is necessary and reasonable, but in the spirit of compromise and to facilitate compliance with the Court's deadlines, Plaintiffs agree to the 15% provision under the current circumstances. The parties notify the Court that no outstanding disputes exist with respect to the attached protocol.

Pursuant to paragraph 4 of the Court's December 2, 2020 Order (Dkt. 647), the proposed date for completion of the Teva Defendants' document production and service of Teva's list of

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non-responsive documents to Plaintiffs is February 15, 2021. This is a target date and is dependent on the validation steps required in the Protocol.

The parties once again thank the Court for its time and careful consideration of these issues.

Respectfully,

GREENBERG TRAURIG, LLP

**MAZIE SLATER KATZ & FREEMAN,
LLC**

/s/ Victoria Davis Lockard
Victoria Davis Lockard, Esq.
Terminus 200
3333 Piedmont Rd., NE
Suite 2500
Atlanta, Georgia 30305
Tel: (678) 553-2103
Fax: (678) 553-2100
*Attorney for Teva Pharmaceuticals USA,
Inc., Teva Pharmaceutical Industries Ltd.,
Actavis LLC, and Actavis Pharma, Inc.*

/s/ Adam M. Slater
Adam M. Slater
103 Eisenhower Parkway, Suite 207
Roseland, New Jersey 07068
Telephone: 973-228-9898
Attorneys for Plaintiffs

cc: Jessica Priselac, Esq. (*via email, for distribution to Defendants' Counsel*)
Seth A. Goldberg, Esq. (*via email*)
Clem C. Trischler, Esq. (*via email*)
Sarah E. Johnston, Esq. (*via email*)
Lori G. Cohen, Esq. (*via email*)
Brian H. Rubenstein, Esq. (*via email*)
Steven M. Harkins, Esq. (*via email*)
valpec@kirtlandpackard.com (*via email*)